

EXHIBIT 1

Request for Compassionate Release

JACOB BRADLEY DEMARAIS # 50347-509

"S" "Brandon Sample" <brandon@brandonsample.com> <"Brandon Sample" <brandon@brandonsample.com>
Tue, 14 Nov 2023 11:30:11 PM -0500
To "TOM-ExecAssistant" <TOM-ExecAssistant@bop.gov>

Dear Warden:

I am writing to request compassionate release for my client, JACOB BRADLEY DEMARAIS # 50347-509. Mr. Demarais has extraordinary and compelling reasons for compassionate release because:

- (1) He fell on ice in Nov 2022 and has been experiencing severe pain in his left knee since then. Despite months of requests for analysis and treatment, the problem continues. He has been told by institution medical staff to take ibuprofen for the pain, but this is contraindicated given that he also suffers from ulcerative colitis. Compassionate release is available when "[t]he defendant is suffering from a medical condition that requires long-term or specialized medical care that is not being provided and without which the defendant is at risk of serious deterioration in health or death." U.S.S.G. 1B1.13(b)(1)(C). The lack of specialized care for this serious medical need places Mr. Demarais at risk of continued serious deterioration in his ability to ambulate.
- (2) He has ulcerative colitis. While Mr. Demarais is being provided with medication for the condition, he is not receiving a proper diet for same. Diet is key to managing this condition.
- (3) His stepfather, Mark, who he has viewed as his dad, is getting older, has serious medical problems, and needs Jacob's assistance at home.

Thank you for your consideration of this request.

Brandon Sample, Esq.

Admitted to Practice in the State of Vermont, the Supreme Court of the United States, the U.S. Courts of Appeals for the 1st, 2nd, 3rd, 4th, 5th, 6th, 7th, 8th, 9th, 10th, 11th & D.C. Circuits and the U.S. District Court for the Northern & Western District of Texas, the Eastern & Western District of Wisconsin, the Northern, Central & Southern District of Illinois, the Northern & Southern District of Indiana, the District of Colorado, the District of North Dakota, the Eastern District of Michigan, the Northern, Southern, Eastern & Western Districts of New York, the District of Vermont, the Eastern District of Arkansas, and the District of Columbia.

Practicing Solely Before Federal Courts and Federal Agencies

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